

FILED

NOV 10 2015

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
STERLING D. GOULD)
)
Defendant.)

CASE NUMBER 3:15-Mj-3124-DGW

Title 18, United States Code,
Sections 922(g)(1), 924(c)(1)(A)(ii),
1951(a), and 2

CRIMINAL COMPLAINT

I, Daniel D. Cook, the undersigned complainant being duly sworn states the following is true and correct to the best of my knowledge and belief:

COUNT 1

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about July 12, 2015, in St. Clair County, Illinois, within the Southern District of Illinois,

STERLING D. GOULD,

defendant herein, did unlawfully obstruct, delay and affect, and attempted to obstruct, delay, and affect, interstate commerce as that term is defined in Title 18, United States Code, Section 1951(a), by robbery, as that term is defined in Title 18, United States Code, Section 1951(a), in that the defendant did unlawfully take and obtain personal property consisting of United States currency in the presence of another – that is, from employees of Dominos restaurant, located at

4000 W. Main Street, Belleville, Illinois – against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons – that is, the defendant entered said Dominos restaurant, demanded money from the Dominos restaurant employees, and took United States currency which was the property of said Dominos restaurant, a business that was at the time engaged in interstate commerce. All in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

BRANDISHING A FIREARM DURING A CRIME OF VIOLENCE

On or about July 12, 2015, in St. Clair County, Illinois, within the Southern District of Illinois,

STERLING D. GOULD,

defendant herein, aided and abetted by others presently unknown, did knowingly brandish, carry, and use a firearm during and in relation to, and did knowingly possess a firearm in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce By Robbery, in violation of Title 18, United States Code, Section 1951, as charged in Count 1, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.

COUNT 3

**UNLAWFUL POSSESSION OF A FIREARM BY A PREVIOUSLY CONVICTED
FELON**

On or about July 14, 2015, in St. Clair County, Illinois, within the Southern District of Illinois,

STERLING D. GOULD,

defendant herein, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Robbery 1st Degree, on or about January 9, 1998, in Case number 97CR002054, in the Twenty-First Judicial Circuit Court, St. Louis, Missouri, did knowingly possess, in or affecting interstate commerce, a firearm, to wit: a Ruger handgun, model Super Blackhawk, .44 caliber, bearing serial number 8105499, said firearm having been previously shipped and transported in interstate commerce. All in violation of Title 18, United States Code, Sections 922(g)(1).

AFFIDAVIT

Your affiant, Daniel D. Cook, after being duly sworn, does hereby state that he is a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and has been so employed for five and a half years, and as such, is vested with the authority to investigate violations of Federal laws, including Titles 18 and 21 of the United States Code. Your affiant also has six years prior Federal law enforcement experience as a United States Postal Inspector and six years prior state law enforcement experience as a municipal Police Officer for the City of Lincoln, Nebraska. Your affiant is currently assigned to the Springfield Division of the FBI, Fairview Heights, Illinois Resident Agency and has primary investigative responsibilities for violent and drug crimes occurring in the Southern District of Illinois.

The statements contained in this affidavit are based on the investigation of your affiant, as well as information derived from reports and interviews of the law enforcement officers and witnesses named herein. In support of this Complaint, your affiant states as follows:

1) On July 12, 2015, at approximately 8:50 p.m., three adult black males wearing white colored cloth face coverings and purple/blue colored gloves entered the Dominos restaurant through the customer entrance/exit door, located at 4000 West Main Street, Belleville, Illinois. One of the adult black males was carrying in his left hand a silver large framed revolver (hereinafter SUSPECT 1). One of the adult black males was wearing a light gray hooded sweatshirt, gray colored Adidas brand shoes, with three dark colored stripes on the side, dark colored shoe laces, and a black or brown colored work / garden type glove on his right hand and a purple /blue colored latex glove on his left hand (hereinafter SUSPECT 2). One of the adult black males was wearing a dark colored long sleeve shirt with some type of small emblem/logo on the chest, wearing dark colored shoes (hereinafter SUSPECT 3).

2) Upon entering the Dominos restaurant, the adult black males ordered the three on-duty Dominos restaurant employees to the ground and ordered one of the employees (manager) to open the cash registers and the store safe. SUSPECT 2 removed United States currency out of the cash registers and placed the United States currency in the front of his hooded sweatshirt or waistband. SUSPECT 3 appeared to act as a “lookout” remaining crouched down near a trashcan next to the front doors for the majority of the time that the robbery was occurring.

3) The Dominos restaurant store safe is on a time delay system. Upon being ordered to open the store safe by SUSPECT 2, one of the Dominos restaurant employee’s (manager) entered the information into the safe to start the unlocking process. The safe has a 9 minute time delay. While waiting for the safe to open, the Domino’s restaurant manager was ordered to stand near the drive through window. The two other Dominos restaurant employees

were order to enter the walk in cooler. Once the time delay on the safe expired, the Dominos restaurant manager opened the safe and SUSPECT 2 instructed SUSPECT 3 to come over to the safe and remove United States currency from the safe. After SUSPECT 3 had removed United States currency from the safe, all three adult black males exited the Dominos restaurant through a back door. In total, these three individuals stole approximately \$368.90 from the Dominos restaurant.

4) After the adult black males had exited the Dominos restaurant, the Belleville Police Department was notified of the armed robbery and responded to the Dominos restaurant. An investigation was initiated. Victims /witnesses were interviewed, evidence was collected, and the Dominos restaurant surveillance video was reviewed. The surveillance video contained both video and audio of the armed robbery.

5) As a result of the Belleville Police Department's investigation into the Dominos restaurant robbery, as well their investigations of multiple similar type pizza restaurant robberies occurring in July 2015, the Belleville Police Department identified a blue, Chevrolet Suburban, Sport Utility Vehicle (SUV) with large chrome rims, as a possible suspect vehicle.

6) On July 13, 2015, at approximately 11:58 p.m., a Belleville Police Officer observed a blue, Chevrolet Suburban, SUV with large chrome rims drive onto the parking lot of a Circle K convenience store located at #1 South Belt West, Belleville, Illinois, and observed an adult black male exit the SUV and walk into the Circle K convenience store. The adult black male was wearing a light colored (white or off white) hooded long sleeve zip up jacket with a gray colored inner liner. The black male was wearing khaki pants and a black shirt under the hooded zip up jacket. The adult black male was wearing gray colored shoes. Belleville Police

Department Officers believed it was unusual for a person to be wearing a hooded sweatshirt with a liner, a black shirt, and khaki pants on a warm July summer night. Belleville Police Officers believed this adult black male matched the physical and clothing description of SUSPECT 2 in the Dominos restaurant armed robbery of July 12, 2015.

7) On July 14, 2015, Belleville Police Officers located a blue, Chevrolet Suburban, SUV with large chrome rims bearing Illinois license plate E768753 parked in the driveway of 924 Peony Street, Belleville, Illinois. Belleville Police Officers observed through the windows (plain view) of the Chevrolet Suburban SUV bearing Illinois license plate E768753 a silver large framed revolver in the backseat. While these officers looked around the Chevrolet Suburban SUV bearing Illinois license plate E768753, a black male, later identified as Sterling D. Gould, year of birth 1978, came out of the residence. Gould was contacted by Belleville Police Officers at the time and was wearing gray colored Adidas brand shoes, with three dark colored stripes on the side. The shoes Gould was wearing appeared identical to the type of shoes SUSPECT 2 in the Dominos restaurant armed robbery of July 12, 2015, was wearing.

8) Gould was then arrested, and during a search incident to arrest, officer recovered from Gould a white colored cloth, which was later determined to be a sleeve from a white t-shirt, in his pants pocket. This white colored cloth, appeared to investigators to be the same type of cloth covering used by the adult black males to cover their faces during the Dominos restaurant armed robbery of July 12, 2015.

9) The blue, Chevrolet Suburban, SUV with large chrome rims bearing Illinois license plate E768753 was towed to the Belleville Police Department. A State (St. Clair County) search warrant was obtained for the Chevrolet Suburban bearing Illinois license plate

E768753. The search warrant for the Chevrolet Suburban SUV bearing Illinois license plate E768753 was executed and recovered inside the vehicle were the following items: (2) white t-shirts with the sleeves missing; (1) white colored sleeve from a t-shirt; (1) grey colored Polo brand hooded sweatshirt; (1) pair of black gloves; (1) Missouri ID card issued to a black male with the initials of M.C.; (1) Missouri ID card issued to Sterling D. Gould; (1) black colored pullover jacket with yellow colored Missouri logo/emblem on the chest; (1) black colored Nike brand hooded sweatshirt; (2) purplish / bluish colored vinyl / latex gloves; (1) silver Ruger, Super Blackhawk, .44 caliber Magnum handgun, bearing serial number 8105499 loaded with five rounds of ammunition; (1) white HTC cellular telephone with damaged screen; (1) black Samsung cellular telephone; and (1) brown colored work type cloth glove.

10) In reviewing the Dominos restaurant robbery surveillance video from July 12, 2015, the gray colored Polo brand hooded sweatshirt recovered in this vehicle appears to match the light gray hooded sweatshirt worn by SUSPECT 2. In reviewing the Dominos restaurant robbery surveillance video, the black colored pullover jacket with yellow colored Missouri logo/emblem on the chest appears to match the dark colored long sleeve shirt with some type of small emblem/logo on the chest worn by SUSPECT 3. In reviewing the Dominos restaurant robbery surveillance video, the silver Ruger Super Blackhawk .44 caliber Magnum handgun, bearing serial number 8105499 loaded with five rounds of ammunition, appears to be the same silver large framed revolver brandished by SUSPECT 1. In reviewing the Dominos restaurant robbery surveillance video, the purplish / bluish colored vinyl / latex gloves appear to be the same type of gloves worn by the adult black male robbers. In reviewing the Dominos restaurant robbery surveillance video, the single brown in color cloth work type glove that was recovered

from the Chevrolet Suburban SUV bearing Illinois license plate E768753 appears to resemble the black or brown colored work / garden type glove worn on the right hand of SUSPECT 2. Based upon what was recovered in the Chevrolet Suburban SUV bearing Illinois license plate E768753, and based upon what Gould was wearing at the time of his arrest, it is believed SUSPECT 2 in the Dominos restaurant robbery is Sterling D. Gould.

11) On July 14, 2015, a Belleville Police Detective recovered and reviewed video surveillance from the Circle K convenience store located at #1 South Belt West, Belleville, Illinois from July 13, 2015. The adult black male observed wearing a light colored (white or off white) hooded long sleeve zip up jacket with a gray colored inner liner, khaki pants and a black shirt under the hooded zip up jacket exiting the blue, Chevrolet Suburban, SUV with large chrome rims, and entering the Circle K convenience store, appears to be Gould. Based upon the surveillance video, it appears the hooded zip up jacket may be reversible as it had a gray inner lining (based on the inside of the hood being gray as well as the sleeve cuffs and zipper area). The clothing and shoes worn by this adult black, which appears to be Gould, match the clothing worn by SUSPECT 2 during the commission of the Dominos restaurant robbery on July 12, 2015.

12) On July 14, 2015, Gould was interviewed by law enforcement officers to include your affiant. The interview was audio and video recorded. Prior to asking Gould any investigative questions, Gould was advised of his Miranda rights. Gould agreed to speak with law enforcement officers.

13) Gould stated the blue Chevrolet Suburban SUV bearing Illinois license plate E768753 belongs to him and he drives the vehicle. Gould admitted the silver Ruger, Super

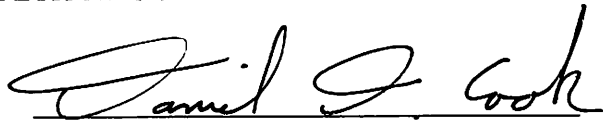
Blackhawk, .44 caliber Magnum handgun, bearing serial number 8105499 loaded with five rounds of ammunition found in the backseat of the Chevrolet Suburban SUV, bearing Illinois license plate E768753, belongs to him. Gould said he knows he is a convicted felon and is prohibited from possessing a firearm. Gould said he possessed the firearm for protection.

14) On July 15, 2015, a review of a Belleville Police Officer's in-car dash camera video that recorded on July 12, 2015, while responding to the Dominos restaurant robbery, showed at approximately 20:59:47 hrs (8:59 p.m.) a blue colored SUV heading Westbound (away from Dominos restaurant) in the 4100 block of West Main Street, Belleville, Illinois.

15) Based on your affiant's training, experience, and research, Sturm, Ruger and Company, Incorporated firearms, to include the silver Ruger, Super Blackhawk .44 caliber Magnum handgun, bearing serial number 8105499 loaded with five rounds of ammunition found in the blue, Chevrolet Suburban SUV, bearing Illinois license plate E768753, are manufactured in the States of New Hampshire, Arizona, and North Carolina, and would have traveled in interstate commerce to have reached the State of Illinois on July 14, 2015.

16) As a result of the robbery on July 12, 2015, Dominos restaurant suffered a reported loss of \$368.90 in United States currency. The \$368.90 in United States currency was the receipts of, and property of, Dominos restaurant. Said receipts were from the sales at the Dominos restaurant of food products that had moved in, and were part of commerce, as that term is defined in Title 18, United States Code, Section 1951(a). Moreover, as a result of the robbery on July 12, 2015, the Dominos restaurant's normal operating procedures were interrupted for a period of time so that an investigation could be conducted.

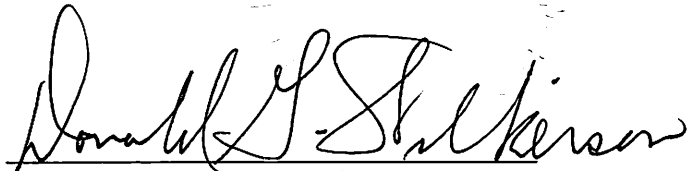
FURTHER YOUR AFFIANT SAYETH NAUGHT.



DANIEL D. COOK
Special Agent, Federal Bureau of Investigation

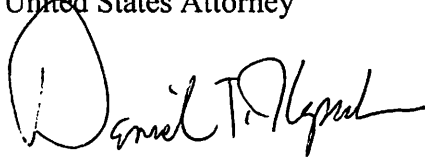
State of Illinois)
) SS.
County of St. Clair)

Sworn to before me and subscribed in my presence on the 10th day of November 2015, at
East St. Louis, Illinois.



DONALD G. WILKERSON
United States Magistrate Judge

STEPHEN R. WIGGINTON
United States Attorney



DANIEL T. KAPSAK
Assistant United States Attorney

Sho. 2 line

Immed E.M.A.



[Faint handwritten signature and text]

[Faint handwritten signature]

[Faint handwritten text]